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February 28, 1994

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William Caton, Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

Re: PP Docket No. 93-253  
Ex Parte Meeting of February 14, 1994

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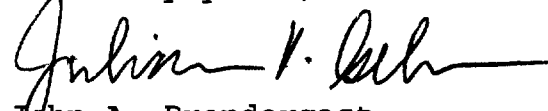
FEB 28 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Caton:

Filed herewith in duplicate is a letter following up on items discussed in our February 14, 1994 ex parte meeting with Karen Brinkman of the Chairman's staff. This letter is being distributed to Ms. Brinkman, as well as the Commissioners and staff members listed on its distribution list.

Sincerely yours,



John A. Prendergast  
Julian P. Gehman

enclosure

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February 25, 1994

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Karen Brinkman  
Attorney Advisor to the Chairman  
Federal Communications Commission  
Room 814  
1919 M Street, NW  
Washington, DC 20554

Re: PP Docket No. 93-253  
Ex Parte Meeting of February 14, 1994

Dear Ms. Brinkman:

We would like to take this opportunity to follow up on our February 14, 1994, meeting with you to present the concerns of the Rocky Mountain Telecommunications Association and Western Rural Telephone Association (collectively "the Western Alliance").

As discussed in our meeting, the Comments of the Western Alliance originally proposed that "rural telephone company" should be defined as having fewer than 20,000 access lines (as the second alternative in a two-pronged definition). This figure was proposed with the membership of the Western Alliance in mind. However, after reviewing the comments submitted in this proceeding, including those of the Small Business Association, the Western Alliance is prepared to embrace a larger figure for purposes of providing the Commission with a more unified position among rural telcos. Therefore, as discussed in our meeting, the Western Alliance would support a definition that includes up to 50,000 access lines. We believe that 50,000 access lines is a rationally based figure, and includes telephone companies that would reasonably expect to be classified as rural.

You had asked for a statistical analysis of the number of telephone companies with 20,000 and fewer access lines compared to those with 20,000 to 50,000 access lines. Attached hereto is a table derived from the Rural Electrification Administration's 1991 statistical report, indicating the size of the two groups. Totals

KAREN BRINKMAN  
February 25, 1994  
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are provided for Western Alliance members, and for all REA borrower telcos.

Toward the end of the meeting you asked whether it would be advisable to encourage competition among multiple PCS providers in rural areas. Western Alliance's position is that they do not oppose competition in PCS, so long as they are given reasonable opportunities to join the competition for a BTA or MTA, and are guaranteed the ability to serve their rural service areas that others are unlikely to include in their system coverage.

Competition policy should be placed in perspective. The top priority must be to achieve the Congressional mandate that full-scale PCS shall be provided to rural areas. Achieving competition among PCS providers in rural areas, while important, must remain secondary to the Congressional policy of universal service. The rural telco frequently is the only entity with a vested interest in providing full-scale PCS to its rural certificated service areas. For this reason, the Western Alliance believes that the partitioning mechanisms proposed in the record would further the public interest by ensuring that an interested party is licensed in areas where coverage gaps may otherwise appear.

If we can answer any further questions, please feel free to telephone.

Sincerely yours,



John A. Prendergast  
Julian P. Gehman

enclosure

cc: Chairman Reed Hundt  
Commissioner James Quello  
Commissioner Andrew Barrett  
Brian Fontes, Senior Legal Advisor to Commissioner Quello  
Byron Marchant, Senior Legal Advisor to Commissioner Barrett  
James Coltharp, Special Advisor to Commissioner Barrett

**ACCESS LINE REPORT**  
**FOR**  
**WESTERN ALLIANCE**  
Statistics taken from REA 1991 Statistical Report

<b>STATE</b>	<b>20,000 &amp; UNDER</b>	<b>20,000 TO 50,000</b>
ALABAMA	24	1
ALASKA	10	2
ARIZONA	4	2
ARKANSAS	15	2
CALIFORNIA	13	0
COLORADO	16	0
FLORIDA	4	4
GEORGIA	21	4
IDAHO	12	0
ILLINOIS	22	1
INDIANA	26	1
IOWA	74	0
KANSAS	30	0
KENTUCKY	14	1
LOUISIANA	15	1
MAINE	12	1
MARYLAND	1	0
MASSACHUSETTS	1	0
MICHIGAN	25	2
MINNESOTA	65	0
MISSISSIPPI	14	0
MISSOURI	21	1
MONTANA	11	0
NEBRASKA	29	1
NEVADA	3	0
NEW HAMPSHIRE	8	0
NEW JERSEY	0	0
NEW MEXICO	8	0
NEW YORK	25	1
NORTH CAROLINA	13	4
NORTH DAKOTA	13	0
OHIO	17	0
OKLAHOMA	26	0
OREGON	20	0
PENNSYLVANIA	17	2
SOUTH CAROLINA	12	4
SOUTH DAKOTA	19	0
TENNESSEE	18	2
TEXAS	36	1
UTAH	7	0
VERMONT	5	0
VIRGINIA	10	0
WASHINGTON	13	0
WEST VIRGINIA	5	2
WISCONSIN	81	1
WYOMING	3	0
FED MICRONESIA	1	0
GUAM	0	1
NORTHERN MARIANAS	1	0
VIRGIN ISLANDS	0	0
<b>GRAND TOTAL</b>	<b>840</b>	<b>42</b>
<b>WESTERN ALLIANCE TOTAL</b>	<b>465</b>	<b>11</b>
<b>PERCENTAGES</b>	<b>53.16%</b>	<b>26.19%</b>